

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF NEW YORK

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In the matter of  
RAYMOND ZDUNSKI

Plaintiff,

-vs-

ERIE 2 CHAUTAUQUA-CATTARAUGUS BOARD  
OF COOPERATIVE EDUCATIONAL SERVICES,  
DAVID O'ROURKE, in his official capacity,  
JOHN O'CONNOR, in his official capacity,  
BRIAN LIEBENOW, LAURIE BÜRGER, and  
TRACY SMITH-DENGLER;

Defendants.

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**NOTICE OF MOTION FOR  
SUMMARY JUDGMENT**

Docket No.: 19-cv-940-GWC

Hon. Geoffrey W. Crawford

MOTION MADE BY:

Defendants, Erie 2 Chautauqua-Cattaraugus Board of Cooperative Educational Services, David O'Rourke, in his official capacity, John O'Connor, in his official Capacity, Brian Liebenow, Laurie Burger, and Tracy Smith-Dengler

DATE, TIME AND  
PLACE OF HEARING

On a date to be set by the Court at the United States District Court for the Western District of New York.

RELIEF SOUGHT:

Summary Judgment in favor of Defendants pursuant to Rule 56 of the Federal Rule of Civil Procedure and such other relief as deemed proper.

SUPPORTING PAPERS:

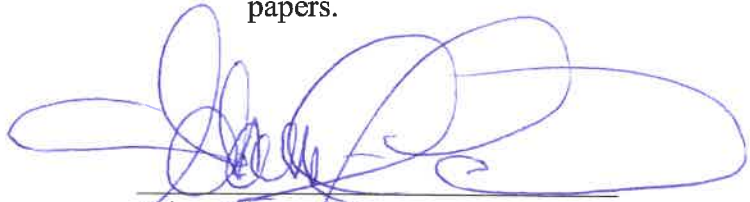
Statement of Undisputed Facts; Affidavit of Adam C. Ferrandino, Esq., dated October 14, 2021, with all attached Exhibits; together with the accompanying Memorandum of Law, and all the

pleadings and proceedings  
hereinbefore had herein.

ANSWERING PAPERS:

Any answering papers must be served in accordance with the Federal Rules of Civil Procedure and any briefing schedule set by the Court. The Defendants request the opportunity to submit reply papers.

Dated: October 14, 2021  
Buffalo, New York



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CATTARAUGUS BOARD OF  
COOPERATIVE EDUCATIONAL  
SERVICES, DAVID O'ROURKE, in his  
official capacity, JOHN O'CONNOR, in his  
official capacity, BRIAN LIEBENOW,  
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